

Dennis F. Dunne (admitted *pro hac vice*)
Samuel A. Khalil (admitted *pro hac vice*)
MILBANK LLP
55 Hudson Yards
New York, New York 10001-2163
Telephone: (212) 530-5000
Facsimile: (212) 530-5219

and

Gregory A. Bray (SBN 115367)
Thomas R. Kreller (SBN 161922)
MILBANK LLP
2029 Century Park East, 33rd Floor
Los Angeles, CA 90067
Telephone: (424) 386-4000
Facsimile: (213) 629-5063

*Counsel for the Official Committee
of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the lead case,
No. 19-30088(DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**SUPPLEMENTAL DECLARATION OF
SAMUEL E. STAR IN SUPPORT OF
THE APPLICATION OF THE
OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR
ENTRY OF AN ORDER PURSUANT
TO 11 U.S.C. §§ 328(A) AND 1103 AND
FED. R. BANKR. P. 2014(A) FOR
AUTHORIZATION TO RETAIN AND
EMPLOY FTI CONSULTING, INC. AS
FINANCIAL ADVISOR NUNC PRO
TUNC TO FEBRUARY 12, 2019**

Date: May 22, 2019

Time: 9:30 a.m.

Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Re: Docket No. 1212

1 I, Samuel E. Star, pursuant to 28 U.S.C. § 1746, to the best of my knowledge and belief, and
2 after reasonable inquiry, declare that the following is true and correct:

3 1. I am a Senior Managing Director of FTI Consulting, Inc. (together with its wholly
4 owned subsidiaries, contractors and employees, “FTI”), an independent global business advisory firm.
5 I am duly authorized to make this declaration on behalf of FTI. Unless otherwise stated in this
6 declaration, I generally have personal knowledge of the matters set forth herein. If called as a witness,
7 I would testify thereto.

8 2. This declaration is being submitted at the request of the Court during the May 22, 2019
9 continued hearing to consider approval of the *Application of the Official Committee of Unsecured*
10 *Creditors for Entry of an Order Pursuant to 11 U.S.C. §§ 328(a) and 1103 and Fed. R. Bankr.*
11 *P. 2014(a) for Authorization to Retain and Employ FTI Consulting, Inc. as Financial Advisors Nunc*
12 *Pro Tunc to February 12, 2019* [Docket No 1212] (the “**Application**”).

13 3. FTI hereby acknowledges the arguments made by counsel to FTI and the Committee in
14 connection with seeking approval of the Application, including written arguments included in pleadings
15 filed by such counsel in support of the Application¹ and oral arguments advanced during the April 24,
16 2019 initial hearing to consider the Application. FTI further agrees to act consistently with the
17 statements made by such counsel in connection with seeking approval of the Application.

18 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
19 correct.

20 Dated: May 23, 2019
21 San Francisco, CA

Respectfully submitted,

22 By: /s/ Samuel E. Star
23 Samuel E. Star
24 Senior Managing Director

25 ¹ Specifically, the (a) *Statement of the Official Committee of Unsecured Creditors in Support of its Application for*
26 *Authority to Retain and Employ FTI Consulting, Inc. as Financial Advisor Effective as of February 15, 2019* [Docket
27 No. 1568]; (b) *Reply in Support of Application of the Official Committee of Unsecured Creditors for Entry of an Order*
28 *Pursuant to 11 U.S.C. §§ 328(a) and 1103 and Fed. R. Bankr. P. 2014(a) for Authorization to Retain and Employ FTI*
Consulting, Inc. as Financial Advisors Nunc Pro Tunc to February 12, 2019 [Docket No. 1571]; and (c) *Supplemental*
Memorandum in Support of the Application of the Official Committee of Unsecured Creditors for Entry of an Order
Pursuant to 11 U.S.C. §§ 328(a) and 1103 and Fed. R. Bankr. P. 2014(a) for Authorization to Retain and Employ FTI
Consulting, Inc. as Financial Advisors Nunc Pro Tunc to February 12, 2019 [Docket No. 2077].